

STEVEN G. KALAR
Federal Public Defender
ELIZABETH M. FALK
Assistant Federal Public Defender
19th Floor Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102
(415) 436-7700
Counsel for Defendant O'SHEA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
CATHERINE O'SHEA,
Defendant.

No. CR-15-0008 EMC

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE STATUS
HEARING AND FOR EXCLUDING
TIME UNDER 18 U.S.C. § 3161**

The parties in this case agree and jointly request the Court to move the status hearing in the above captioned case from February 18, 2015 to March 4, 2015 at ^{2:30 p.m.}~~2:00~~ p.m. The reason for this request is that defense counsel needs more time to review the discovery materials with her client and enter negotiations with the government regarding a potential resolution. Moreover, unexpected medical complications recently resulted in a change in counsel for the United States. A two-week continuance will allow all parties adequate time to prepare the case.

The parties concur that granting the exclusion would allow the reasonable time necessary for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such an exclusion of time for the purposes of effective preparation of counsel outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Accordingly, due to the reasons stated above, the parties jointly move to continue the status

1 hearing to March 4 2015 at 2:30 p.m.

2
3 SO STIPULATED:

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5 MELINDA HAAG
United States Attorney

6
7 DATED: February 17, 2015

8 /s/
HALLIE HOFFMAN
Assistant United States Attorney

9
10 DATED: February 17, 2015

11 /s/
ELIZABETH FALK
Attorney for Defendant Catherine O'Shea

12
13
14 [PROPOSED] ORDER

15 For the reasons stated above the Court hereby CONTINUES the status conference hearing
16 in the aforementioned case from February 18, 2015 to March 4, 2015 at 2:30 p.m. The Court
17 further finds that the exclusion from the time limits of this period applicable under 18 U.S.C. §
18 3161 is warranted and that the ends of justice served by the continuance outweigh the best
19 interests of the public and the defendant in a speedy trial. Denying the requested exclusion of
20 time would deprive the defendant effective preparation of counsel, taking into account the
21 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

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23 IT IS SO ORDERED.

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25 DATED: 2/17/15
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